REMARKS

This is intended as a full and complete response to the Final Office Action dated August 22, 2007, having a shortened statutory period for response set to expire on November 22, 2007. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraphs [0001], [0035], [0044], and [0046] have been amended to correct minor editorial problems.

Claims 1-26 are pending in the application. Claims 1-26 remain pending following entry of this response.

Specification Objections

The disclosure is objected to because of the following informalities: Attorney Docket Number at paragraphs 1 and 46 should be replaced with the Application serial number and its current status. Applicants have amended the paragraphs at paragraph 1 and 46 as requested by the Examiner. Accordingly, Applicants respectfully request that this objection be withdrawn.

Claim Rejections - 35 U.S.C. § 103

Claims 1-26 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Amro* et al. (U.S. Patent 6,041,326) in view of *Young* (U.S. Patent 6,560,606). Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or

references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143. The present rejection fails to establish at least the third criteria.

In this case, *Amro* does not teach a "method for invoking a plurality of functional modules configured to process a query result retrieved from a database from within an application" that includes "providing a configuration file containing information regarding invocation of the functional modules, wherein the configuration file specifies at least an input field of the query result required by at least one of the functional modules and at least one output field produced by one of the plurality of functional modules," and also includes "invoking the plurality of functional modules to process the query result in a manner determined according to information retrieved from the configuration file," as recited by claim 1. Claims 11, 15, and 20 recite similar limitations. Instead, *Amro* discloses a plug-in system configured to process a list of website links returned in response to a search engine query.

As disclosed in *Amro*, a "search engine, on the Internet, is essentially a program that searches for keywords in files and documents found on the World Wide Web or other such computer networks." See *Amro*, 9:14-16. *Amro* describes the use of a plug-in program configured to filter search results according to some criteria specified by the user. For example, *Amro* provides:

> A user-defined plug-in program thus functions between the actual search engine utilized by the user and the user. Search results from the search engine can be filtered through such user-defined plug-in programs. The filtered search results are then displayed for the user as the actual search results.

Amro, 10:61-66. And further provides:

> the user "plug-in" program acts as a filter by comparing the search engine "hits" with the database of known (i.e., previous) hits. Undesirable hits are thus weeded out in this manner, and the desirable hits (i.e., "good" hits) are presented, as illustrated at block 188. Finally, as illustrated at block 190, a "hit" list and ranking of such hits is presented to the user.

Amro, 11:63-67 – 12:1-2. The Examiner relies on these passages to assert that *Amro* discloses providing a configuration file containing information regarding invocation of the functional modules, wherein the configuration file specifies at least an input field of the

query result required by at least one of the functional modules and at least one output field produced by one of the plurality of functional modules, as recited by Claim 1. At best however, this passages cited by the Examiner reflect that a plug-in may be used to refine a list of websites returned by an internet search engine. By its own terms, *Amro* provides:

> A simple comparison between a "hit" and this database may be programmed to weed out undesirable "hits." Also, the converse may also be programmed. More desirable network sites or types of networked sites may be ranked higher in a "hit" list produced than sites that are not as desirable to the university professor. For example, when searching for specific plant life indigenous to Zaire, sites actually residing the closest to Zaire can be ranked higher than sites located in Australia, for example.

Amro, 11:27-35. Applicants submit that the disclosure in *Amro* of a plug-in configured to refine a list of website links (through filtering and/or rank ordering) fails to disclose "a configuration file containing information regarding invocation of the functional modules," in particular, where "the configuration file specifies at least an input field of the query result required by at least one of the functional modules and at least one output field produced by one of the plurality of functional modules." First, no configuration file is accessed; instead, the search engine results are processed by the plug-in dynamically, based on user input. See e.g., *Amro*, 11:1-5. Further, nothing in the act of a user specifying user input discloses a configuration file that includes "at least one output field produced by one of the plurality of functional modules,:" as recited by claims 1, 11, 15, and 20.

Further still, the Examiner concedes that *Amro* does not disclose "the plurality of functional modules," as recited by claims 1, 11, 15, and 20. To address this limitation, the Examiner turns to *Young*. However, *Young* is directed to "telecommunication systems, and more particularly to computer processing of metered information." *Young* 1:8-10. More simply, *Young* is directed to techniques for billing customers for using different telecommunication services. The material cited by the Examiner is directed to processing performed "pipeline stage" used to process an "input queue." The pipeline itself, it is part of "a metered data processing system 104 for processing the metered data to generate useful information regarding communication services usage." *Young*,

4:53-55. That is, the pipeline generates information used to calculate a customer bill. Depending on what services a consumer subscribes to or consumes, the method for calculating a bill for a metered service may vary.

It is entirely unclear how the Examiner believes that the "pipeline stages" used to process an "input queue" to determine how much to charge a consumer for using a particular telecommunication service could be combined with a plug-in program configured to process a list of website links returned by a search engine. The Examiner suggests "Young's [sic] would have allowed Amro's [sic] to provide a method for improving efficiency in reducing overhead associated with processing, as noted by Young (Column 2, lines 32-35)." See Office Action, p. 10. Applicants submit, however, that this general goal of "improving efficiency in reducing overhead associated with processing," fails to provide any specific indication of just how the proposed combination would operate, if it would operate at all.

Accordingly, for all the foregoing reasons, Applicants submit that claims 1, 11, 15, and 20, as well as the respective dependant claims, are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Gero McClellan, attorney of record, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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